

From: Rachel West <rwest@mlj-llc.com>
To: Jelena Hartman <JHartman@waterboards.ca.gov>
CC: Susan Fregien <sfregien@waterboards.ca.gov>, Michael Johnson <mjohnson@m...>
Date: 2/15/2012 7:42 AM
Subject: Re: Mgt Plan Constituent Removal Request

Hello Jelena,

You are correct, samples collected during irrigation monitoring at Dry Creek @ Wellsford Rd and Highline Canal @ Hwy 99 in 2008 were for total copper analysis only. There are two reasons why dissolved copper analysis was not conducted on samples collected from the two sites during 2008 monitoring.

1. The Coalition did not begin monitoring for both the total and dissolved copper fractions until October 2008. The January through September 2008 monitoring that took place at the two locations was under the 2006 MRPP (storm and irrigation monitoring only). Both Dry Creek @ Wellsford Rd and Highline Canal @ Hwy 99 were monitored for total copper through the irrigation season in 2008.
2. The current 2008 MRPP went into effect beginning October 2008. Sampling at Dry Creek @ Wellsford Rd and Highline Canal @ Hwy 99 did take place from October through December 2008. However, the two sites were scheduled as Core Monitoring locations from October 2008 through December 2010 under the 2008 MRPP. Dissolved and total copper fractions were not analyzed at either location from October through December (fall season) 2008 because the two sites were Core Monitoring locations under the new 2008 MRPP.

Please let me know if you have any other questions.

Thanks,
Rachel

On Tue, Feb 14, 2012 at 5:20 PM, Jelena Hartman <JHartman@waterboards.ca.gov> wrote:

- > Hello Rachel,
- >
- > Thank you for the answers and for providing the summary of the recent
- > monitoring results and 2008 PUR data.
- >
- > My information indicates that Dry Creek @ Wellsford Rd and Highline Canal
- > @ Hwy 99 were sampled for copper in 2008. As samples were tested for total
- > copper, it was not clear why dissolved fraction was not included in the
- > analyses. Otherwise, your explanations addressed all remaining issues, and
- > I have no further questions at this time.
- > Thanks,
- >
- > Jelena
- >
- >
- > Jelena Hartman | Environmental Scientist
- >
- > Monitoring and Implementation Unit
- > Irrigated Lands Regulatory Program

> Central Valley Regional Water Quality Control Board
> 11020 Sun Center Drive, Suite 200
> Rancho Cordova, CA 95670-6114
>
> office: 916.464.4628
> fax: 916.464.4780
> email: jhartman@waterboards.ca.gov
> website: www.waterboards.ca.gov/centralvalley/
>
> >>> Rachel West <rwest@mlj-llc.com> 2/14/2012 7:46 AM >>>
> Hello Susan and Jelena,
> We have provided answers to your questions concerning the Management
> Plan Constituent Removal Request below. The attached excel file contains
> the tables you requested. Please let us know if you need further
> explanation or information.
>
> 1. In May 2009 lead sampling was reduced to a single event of high TSS,
> and lead was added back to monitoring in July 2010. Are any data available
> for lead at Ash Slough @ Ave 21 since 2006?
>
> · No data are available for lead at Ash Slough @ Ave 21 since 2006. The
> most recent lead data from Ash Slough @ Ave 21 are from the 2006 irrigation
> season since Ash Slough was dry in 2007, 2008 and most of 2009. The only
> time that Ash Slough was not dry was in May 2009 and April 2010 when the
> Coalition was not monitoring for lead.
>
> 2. Was MPM for diuron conducted at Dry Creek @ Wellsford Rd in 2009?
>
> · Management Plan Monitoring for diuron was not conducted at Dry Creek @
> Wellsford Rd in 2009. The Coalition's original management plan strategy
> did not address storm exceedances due to the difficulty in sourcing those
> exceedances. Some exceedances may occur because of storm runoff or they
> may occur due to the use in that month. In addition, at the time of the
> development of the management plan strategy the Coalition was not
> monitoring monthly (only storms and irrigation months). Starting in 2010
> the Coalition began monitoring for management plan constituents during the
> storm month that they occurred regardless of a rain event.
>
>
> 3. Monitoring for dissolved copper started in 2008 (e.g. Deadman Creek
> site subwatershed). Are 2008 and 2009 data on dissolved copper available
> for Dry Creek @ Wellsford Rd, and Highline Canal @ Hwy 99?
>
> · No copper (dissolved) data are available from 2008 and 2009 for Dry
> Creek @ Wellsford Rd and Highline Canal @ Hwy 99 since they were sampled
> for Core Monitoring constituents as per the approved MRPP. The Coalition
> began MPM for copper (total and dissolved fractions) in 2010.
>
> 4. Water column toxicity to *S. capricornutum* in April persisted into May
> 2008 at Duck Slough @ Hwy 99. Was the month of May included in the MPM
> schedule for 2009 and 2010?
>
> · No, May is not included as month for MPM at Duck Slough @ Hwy 99 for
> algae toxicity. There have been two instances of toxicity to *S.
> capricornutum* at Duck Slough @ Hwy 99; the first was on 7-12-2005 and
> the second was on 4-29-2008 (the 5-7-2008 toxicity occurred during a

> resampling event). Under the 2006 MRP, if a sample was determined to be
> toxic, the Coalition collected a “resample” the following week to test for
> persistence of the original toxicity. When reviewing past toxicities at
> any sampling site, the Coalition considers a toxic sample and its
> subsequent resample to be a single event. If toxicity occurred in the
> resample, the resample is not counted as a “second” toxicity—the resample
> is still considered to be part of the first event. Hence, the Coalition
> only considers the month during which the initial toxic sample was
> collected as the month of a past exceedance for scheduling MPM.
>
>
> 5. Toxicity to *C. dubia* (0% survival) was reported at Prairie Flower
> Drain @ Crows Landing Rd in August 2011. What were the results of TIE for
> *C. dubia* - was the source of toxicity identified?
>
> · A TIE was conducted on 8-11-2011 on the samples that were collected
> from Prairie Flower Drain @ Crows Landing Rd on 8-9-2011. The results
> from the TIE indicated that pyrethroid insecticides were the cause of the
> toxicity to **C. dubia**.
>
> 6. Are PUR data available for copper at Deadman Creek @ Gurr Rd, and
> chlorpyrifos at Duck Slough @ Gurr Rd?
> Yes, PUR data are available for copper at Deadman Creek @ Gurr Rd and for
> chlorpyrifos at Duck Slough @ Gurr Rd. All PUR data are summarized over
> multiple years starting in 2004 in the site subwatershed sections of the
> MPUR submitted annually. All high priority subwatersheds’ PUR data are
> analyzed in the MPUR Site Subwatershed Appendix to be submitted on April 1,
> 2012. In addition, PUR data related to exceedances are submitted with the
> AMRs (March 1, 2012). We have a large database that we maintain to house
> data obtained from CalPIP (DPRs online database which is current through
> 2010) and preliminary data obtained from the county Ag Commissioners. If
> you need PUR graphs of copper and chlorpyrifos from the MPUR 2012 that we
> are currently preparing for our April 1, 2012 report, please let us know
> and we can send you those as they are created in house before the April 1
> report submittal.
>
>
> 7. The request states that Assessment Monitoring at Bear Creek @ Kibby
> Rd is scheduled for 2025 and 2026, and Table 10 in 2010 MRP Plan indicates
> the period 2023-2024. Has there been an update that moved the Assessment
> Monitoring at Bear Creek @ Kibby Rd back?
>
> Yes, the dates listed in Table 10 of the 10-20-2010 MRPP (approved
> 2-23-2011) are correct. Bear Creek @ Kibby Rd will rotate into Assessment
> Monitoring in 2023-2024. There was a typo in the letter.
>
> 8. Summary table in the request letter lists DO at Highline Canal @
> Lombardy Rd but no mention is made in the text. Does the Coalition want to
> include DO at Highline Canal @ Lombardy Rd in the request?
>
> There has only been one exceedance of DO at Highline Canal @ Lombardy Rd
> on 3-4-2008. Therefore, DO is not in an active management plan at the
> site and should not have been in the summary table; this was a typo.
> Thank you,
> Rachel
>

> On Fri, Feb 10, 2012 at 5:04 PM, Melissa Turner <mturner@mlj-llc.com>wrote:
>
>> ****
>>
>> Hi Susan and Jelena,****
>>
>> Mike and I are away in meetings all day Monday and Tuesday. I have
>> forwarded this to Rachel and will have her respond as many of your
>> questions below as she can. If she is unable to answer any of the below
>> questions, I will respond as soon as possible (possibly Monday evening).*
>> ***
>>
>> In addition, should we be sending exceedance report to Jelena instead of
>> Chris Jimmerson?****
>>
>> Thanks,****
>>
>> Melissa****
>>
>> *From:* Susan Fregien [mailto:sfregien@waterboards.ca.gov]
>> *Sent:* Friday, February 10, 2012 3:43 PM
>> *To:* Mike Johnson; Melissa Turner; pklassen@unwiredbb.com
>> *Cc:* Jelena Hartman
>> *Subject:* Mgt Plan Constituent Removal Request****
>>
>> ****
>>
>> Dear Parry, Mike and Melissa,****
>>
>> Staff is in the process of reviewing the constituent removal request
>> submitted by the ESJWQC in January. In order to make a determination
>> regarding specific constituents at selected site subwatersheds, additional
>> information would be useful. Could you provide more information for the
>> questions listed below, and fill in the blanks for the shaded columns in
>> Tables 1 and 2?****
>>
>> ****
>>
>> Jelena Hartman (our new Unit staff person) compiled the questions and
>> tables that will help in our evaluation of your request. Please coordinate
>> with Jelena to provide the requested information. Feel free to email (
>> jhartman@waterboards.ca.gov) or call Jelena (464-4628) if you need any
>> clarification on the questions or tables. ****
>>
>> ****
>>
>> *Questions:*
>>
>> 1. In May 2009 lead sampling was reduced to a single event of high TSS,
>> and lead was added back to monitoring in July 2010. Are any data available
>> for lead at Ash Slough @ Ave 21 since 2006? ****
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>> 2. Was MPM for diuron conducted at Dry Creek @ Wellsford Rd in 2009? ****
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>> 3. Monitoring for dissolved copper started in 2008 (e.g. Deadman Creek
>> site subwatershed). Are 2008 and 2009 data on dissolved copper available

>> for Dry Creek @ Wellsford Rd, and Highline Canal @ Hwy 99?****

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>> 4. Water column toxicity to *S. capricornutum* in April persisted into

>> May 2008 at Duck Slough @ Hwy 99. Was the month of May included in the MPM

>> schedule for 2009 and 2010? ****

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>> Drain @ Crows Landing Rd in August 2011. What were the results of TIE for

>> *C. dubia* - was the source of toxicity identified?****

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>> chlorpyrifos at Duck Slough @ Gurr Rd?****

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>> 7. The request states that Assessment Monitoring at Bear Creek @ Kibby

>> Rd is scheduled for 2025 and 2026, and Table 10 in 2010 MRP Plan indicates

>> the period 2023-2024. Has there been an update that moved the Assessment

>> Monitoring at Bear Creek @ Kibby Rd back?****

>>

>> 8. Summary table in the request letter lists DO at Highline Canal @

>> Lombardy Rd but no mention is made in the text. Does the Coalition want to

>> include DO at Highline Canal @ Lombardy Rd in the request? ****

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>> ****

>>

>> **Table 1.** Summary of monitoring results: number of tests, detections and exceedances in the fourth quarter of 2011 and in 2012.

Station Name	Analyte	Oct-Dec 2011			2012		
		tests	detect	exceed	tests	detect	exceed
Cottonwood Creek @ Rd 20	diazinon						
	diuron						
Duck Slough @ Gurr Rd	chlorpyrifos						
Highline Canal @ Hwy 99	chlorpyrifos						
	diuron						

Table 2. PUR data for 2008 when majority of exceedances or detections occurred.

Station Name	Analyte	Amount Applied	Acres Treated
Cottonwood Creek @ Rd 20	diazinon		
	diuron		
Dry Creek @ Wellsford Rd	diuron		
Highline Canal @ Hwy 99	chlorpyrifos		
Mustang Creek @ East Ave	chlorpyrifos		
Prairie Flower Drain @ Crows Landing Rd	chlorpyrifos		

Regards,
 Susan
 Susan Fregien, Senior Environmental Scientist
 Monitoring and Implementation Unit
 Irrigated Lands Regulatory Program
 Central Valley Regional Water Quality Control Board
 11020 Sun Center Drive Suite 200
 Rancho Cordova, CA 95670-6114

phone: [916-464-4813](tel:916-464-4813)
fax: [916-464-4780](tel:916-464-4780)

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Rachel C. West  
Environmental Scientist  
Michael L. Johnson LLC  
632 Cantrill Drive  
Davis, CA 95618

Tel: [530-756-5200](tel:530-756-5200)  
Fax: [530-756-5225](tel:530-756-5225)  
[rwest@mlj-llc.com](mailto:rwest@mlj-llc.com)

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Rachel C. West
Environmental Scientist
Michael L. Johnson LLC
632 Cantrill Drive
Davis, CA 95618

Tel: 530-756-5200
Fax: 530-756-5225
rwest@mlj-llc.com